

From: [Helder, Dirk](#)
To: [Boccato, Gianpaolo](#)
Subject: #2
Date: Wednesday, August 31, 2016 11:11:12 AM

Best,
Dirk Helder
US EPA
(208) 378-5749

From: Helder, Dirk
Sent: Monday, June 27, 2016 1:05 PM
To: 'Brad Bluemer' <bbluemer@bonnercountyid.gov>
Subject: RE: IMPORTANT: EPA Pesticide General Permit Information

Brad,
Thanks for the note...See my comments below in RED...I think this can easily be resolved and I appreciate your help on this...I will be out of the office for about a week and we can get together when I return to answer any additional questions.
Best,
Dirk Helder
US EPA
(208) 378-5749

From: Brad Bluemer [<mailto:bbluemer@bonnercountyid.gov>]
Sent: Monday, June 27, 2016 11:59 AM
To: Helder, Dirk <Helder.Dirk@epa.gov>
Subject: RE: IMPORTANT: EPA Pesticide General Permit Information

Dirk,

I've just returned to the office from a week off duty. I will seek to resolve these issues ASAP. I must admit this is a surprise to me creating quite a bit of confusion. This is the first time anyone from EPA has notified me that our reporting was incomplete. I thought we were in compliance. Therefore I must assume I have a huge miss-understanding as to what I must do exactly. (Brad-all other years the annual reports look fine, it is just 2014 that seems to be missing some information.)

Since I have not found descriptive examples of forms or reports that "do" comply with all necessary requirements, I suppose I'll be guessing what is adequate.

The attached application forms you included do satisfy Idaho state reporting and I thought you told "me or us" at our state weed conference that these state approved reports would probably adequate for EPA. They're the only documents we have for applications in 2014 I believe.

I'll spend more time reading the documents you're asking for then communicate further with you. (I think your forms satisfy some of the requirements, but the PDMP also requires consideration of pesticide alternatives, pest identification, pest pressure consideration, and a few other items. I think a lot of what you do on a daily basis, some of it institutional knowledge, some of it probably is in your head but may not be written down, some of this information should be included in the PDMP. The PDMP is primarily a planning tool that once developed rarely needs modification that is designed to try and reduce pesticides getting into water by using alternative control methods or to reduce pesticides getting into water by using the most effective product at the proper application rate.)

Regards,
Brad Bluemer
Bonner County Weed Superintendent
1500 Hwy 2, ste.101
Sandpoint, ID. 83864
208-255-5681
bbluemer@bonnercountyid.gov

From: Helder, Dirk [<mailto:Helder.Dirk@epa.gov>]
Sent: Thursday, June 23, 2016 11:37 AM
To: Brad Bluemer
Cc: Potokar, Steven
Subject: IMPORTANT: EPA Pesticide General Permit Information

Brad,
Maybe we can get on the phone together sometime soon to discuss this more fully. But, there are two things I need your help with regarding Bonner County's Pesticide General Permit (IDG87A287).

First, I was provided the enclosed pdf that includes aquatic pesticide applications made during 2014 by Bonner County. The Bonner County annual report submitted to EPA does not include any pesticide application information. You should go back and update your 2014 annual report to include all applications made to the aquatic environment including the applications included in the enclosed pdf.

Second, you had previously provided a copy of Bonner County's application report to me that does not adequately include all the information required by EPA in the "Pesticide Discharge Management Plan" (PDMP). I have enclosed all the permit conditions below for your review. But, in particular you should review and update your PDMP (see Section 5 below) and provide a copy of that to me.

If you have any questions, please give me a call so we can discuss this more fully and please confirm you have received this note and are actively working to address both issues. I am hopeful you can take care of both of these issues within the next 2 weeks (and provide the information back to EPA by July 11th). Let me know if this timeframe works for you and if I can assist you in any way, please let me know.

Best,
Dirk Helder
U.S. EPA
(208) 378-5749

Your requirements are:

[Submit a Notice of Intent \(NOI\), Part 1.2.2 \(PDF\)](#) (174 pp, 1.3 MB, [About PDF](#))
[Technology-Based Effluent Limitations, Part 2.2: Decision-makers' Responsibilities for all Decision-makers \(PDF\)](#) (174 pp, 1.3 MB, [About PDF](#))
[Technology-Based Effluent Limitations, Part 2.2: Decision-makers' Responsibilities for Decision-makers Required to Submit NOIs \(PDF\)](#) (174 pp, 1.3 MB, [About PDF](#))
[Water Quality, Part 3 \(PDF\)](#) (174 pp, 1.3 MB, [About PDF](#))
[Monitoring, Part 4 \(PDF\)](#) (174 pp, 1.3 MB, [About PDF](#))
[Pesticide Discharge Management Plan, Part 5 \(PDF\)](#) (174 pp, 1.3 MB, [About PDF](#))
[Corrective Action, Part 6 \(PDF\)](#) (174 pp, 1.3 MB, [About PDF](#))
[Recordkeeping, Parts 7.1, 7.4, and 7.5 \(PDF\)](#) (174 pp, 1.3 MB, [About PDF](#))
[Annual Report, Part 7.6 \(PDF\)](#) (174 pp, 1.3 MB, [About PDF](#))
[Permit Conditions Applicable to Specific States \(including Territories\) and Indian Country Lands, Part 9 \(PDF\)](#) (174 pp, 1.3 MB, [About PDF](#))
[Standard Permit Conditions, Appendix B \(PDF\)](#) (174 pp, 1.3 MB, [About PDF](#))

If you are self-applying a pesticide, your requirements also include:

[Technology-Based Effluent Limitations, Part 2.1: Applicators' Responsibilities \(PDF\)](#) (174 pp, 1.3 MB, [About PDF](#))